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May 8, 2020

By ECF

Hon. Laura Taylor Swain
United States District Judge
Southern District of New York
500 Peal Street
New York, NY 10007

MEMO ENDORSED

United States v. Ionela Constantinescu,
19 Cr. 651 (LTS)

Your Honor:

I represent Ionela Constantinescu in the above-captioned case and write with the consent of Pretrial Services Officer, Rena Bolin, and the consent of the government, respectfully to request that Ms. Constantinescu's bail conditions be modified to remove the requirement of home detention. For the time being Ms. Constantinescu consents to location monitoring and a curfew.

The reason for the request is that Ms. Constantinescu has moved to New York City, upon Your Honor's consent to the defense's previous request and in attempting to get her family settled has reason to leave the house periodically to get supplies and household needs. Additionally, the family is searching for a different apartment to live in due to previously unforeseen circumstances and Ms. Constantinescu needs to be able to go view potential apartments and act quickly so as not lose the apartment to another potential renter while waiting for permission to go view the place.

Ms. Constantinescu has remained in perfect compliance with the terms of her release in Florida while in maintaining employment as a Lyft driver and caring for her children. She has also remained in perfect compliance while here in New York and is seeking employment, as she is not currently driving for Lyft.

Given these circumstances, granting Ms. Constantinescu's request to remove home detention is in the spirit of the "**least restrictive**" combination of conditions needed to ensure her appearance in court. 18 U.S.C. § 3142(c)(1)(B) (emphasis added).

For the foregoing reasons, I respectfully request that the Court endorse this letter to allow Ms. Constantinescu requested bail modifications above. Should the Court grant

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this request, defense counsel will notify SDNY pretrial services promptly. Further, defense counsel will notify the Court, the government and pretrial services should Ms. Constantinescu relocate to a new address. Thank you for your consideration of this request.

Respectfully submitted,

/s/ Jacob Mitchell
Jacob Mitchell
Attorney for Ionela Constantinescu

cc: AUSAs Robert Sobleman, Elizabeth Hanft, Daniel Loss and Samuel Rothschild
Pretrial Services Officer Rena Bolin (by email)
Ionela Constantinescu (by email)

The requested modification is granted. DE# 258 resolved.

SO ORDERED.

5/8/2020

/s/ Laura Taylor Swain, USDJ